

CAUSE NO. 4:22-cv-00088

**WILMINGTON SAVINGS FUND §
SOCIETY, FSB, D/B/A CHRISTIANA §
TRUST, NOT INDIVIDUALLY BUT §
AS TRUSTEE FOR PREMIUM §
MORTGAGE ACQUISITION §
TRUST,** §
§

Plaintiff, §
v. §

CIVIL ACTION NO. 4:22-cv-00088

**LEEROY M. MYERS; BARBARA §
MYERS,** §
§

Defendants. §

DECLARATION OF ATTORNEY RAMONA V. LADWIG

BEFORE ME, the undersigned authority, on this day personally appeared Ramona Ladwig, a person whose identity is known to me, who after having been duly sworn, deposed and stated upon penalty of perjury the following:

1. My name is Ramona Ladwig. I am over the age of 21 years. I am of sound mind capable of making this Affidavit, and am fully competent to testify to the matters stated herein. The facts stated in this Affidavit are within my personal knowledge and are based on my review of the hereinafter described business records.

2. I am an employee of the law firm of McCarthy & Holthus, LLP (“MH”), who represents the Plaintiff in this matter as foreclosure counsel. I am one of the custodian of records of MH and am familiar with the manner in which its records are created and maintained by virtue of my duties and responsibilities. Attached to this affidavit are records from MH and the

information contained herein is obtained from records kept by MH in the regular course of business. It is the regular practice of the business to make such records and for an employee or representative of MH with personal knowledge of the act, event, condition, opinion, or diagnosis set forth in the records to make these records or to transmit the information to be included in such records. The records were made at or near the time or reasonably soon after the event, condition, opinion, or diagnosis set forth in the records. The records attached hereto are the original records or exact duplicates of the original records.

3. Defendants received a letter dated February 18, 2022 from Opposing Counsel Ira Joffe (“Opposing Counsel”) regarding his client accepting service of a filing. Attached as **Exhibit 3-1** is a copy of this letter that was addressed to then-counsel for Defendants in this matter, Esteban Gonzales of McCarthy Holthus.

4. On April 8, 2022, a Request for Waiver for Service was sent that was never returned. A true and correct copy of this Waiver is attached as **Exhibit 3-2**.

5. Defendants received a letter dated April 11, 2022 from Opposing Counsel regarding acceptance of service and with a history of the case with claims repeated from a prior letter sent to Mr. Gonzales. Attached as **Exhibit 3-3** is a copy of this letter that was addressed to Ramona Ladwig, current counsel for Defendants in this matter.

6. Defendants received a letter dated April 12, 2022 from Opposing Counsel. A copy of this letter is attached as **Exhibit 3-4**.

7. Defendants received a letter dated May 20, 2022 from Opposing Counsel. This letter was addressed to Cole Patton of McCarthy Holthus. A copy of this letter is attached as **Exhibit 3-5**.

8. Defendants received another letter dated May 27, 2022 from Opposing Counsel.

A copy of this letter is attached as **Exhibit 3-6**.

9. Defendants received a letter dated June 1, 2022 from Opposing Counsel. A copy of this letter is attached as **Exhibit 3-7**.

10. Defendants received a letter dated June 7, 2022 from Opposing Counsel. A copy of this letter is attached as **Exhibit 3-8**.

11. Defendants received a letter dated June 13, 2022 from Opposing Counsel. A copy of this letter is attached as **Exhibit 3-9**.

Ramona Ladwig

Name: Ramona Ladwig

Title: Attorney of McCarthy & Holthus, LLP